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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ALEC Rafter, } Case No. 4:18-cv-06870-KAW
Plaintiff, } STIPULATION AND [PROPOSED]
vs. } ORDER FOR AN EXTENSION OF TIME
ANDREW SAUL, }
Commissioner of Social Security, }
Defendant. }

1 IT IS HEREBY STIPULATED, by and between the parties through their respective
2 counsel of record, with the Court's approval, that Defendant shall have a 22-day extension of
3 time, from October 21, 2019 to November 12, 2019, for Defendant to respond to Plaintiff's
4 Motion for Summary Judgment (Dkt. No. 27).

5 This is Defendant's second request for an extension of time. Good cause exists for this
6 extension due to Defendant's counsel's workload as described below. Defendant's counsel was
7 on leave from August 23 to September 3, which was a primary reason for seeking the first
8 extension. Since returning from leave, Defendant's counsel has worked on approximately 32
9 district court cases, as well as two Ninth Circuit appeals. Counsel is also responsible for other
10 substantive non-litigation matters in the Office of General Counsel.

11 Additional time is required to review the record, to evaluate the numerous issues raised in
12 Plaintiff's brief, to determine whether options exist for settlement, and if not, to prepare
13 Defendant's response to the opening brief. Defendant's counsel will endeavor to complete these
14 tasks as soon as possible. This request is made in good faith and with no intention to unduly
15 delay the proceedings, and counsel apologizes for any inconvenience.

16 Plaintiff does not oppose Defendant's request for an extension of time. The parties
17 further stipulate that the deadline for any reply by Plaintiff, if necessary, will be extended
18 accordingly.

1 Respectfully submitted,

2 Dated: October 16, 2019

3 /s/ Georgeana K. Roussos

4 (*as authorized via email on October 16, 2019)

5 GEORGEANA K. ROUSSOS

6 Attorney for Plaintiff

7 Dated: October 16, 2019

8 DAVID L. ANDERSON
9 United States Attorney
10 DEBORAH LEE STACHEL
11 Regional Chief Counsel, Region IX
12 Social Security Administration

13 By: /s/ Allison J. Cheung
14 ALLISON J. CHEUNG
15 Special Assistant U.S. Attorney
16 Attorneys for Defendant

17 ORDER

18 Pursuant to stipulation, IT IS SO ORDERED. No further extensions will be granted.

19 Dated: 10/18/2019

20 
21 THE HONORABLE KANDIS A. WESTMORE
22 United States Magistrate Judge